

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Steve George-Lorenzo HICKS

Case No.

Case: 2:23-mj-30431

Assigned To : Unassigned

Assign. Date : 10/24/2023

Description: RE: STEVE

GEORGE-LORENZO HICKS
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 27, 2022 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: October 24, 2023City and state: Detroit, Michigan*Complainant's signature*Special Agent Justin Henry - ATF*Printed name and title**Judge's signature*Honorable David R. Grand, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Special Agent Justin K. Henry, being duly sworn, state and depose the following:

1. I make this affidavit with personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, reviewing reports, and considering information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

2. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) since May 2014. I am currently assigned to Detroit Group VII. Prior to being employed as a Special Agent, I was a Police Officer with the Wayne State University Police Department (WSUPD), for over six years. During that time, I was assigned to an ATF Task Force and assigned with the Wayne County Sheriff's Office Narcotics Enforcement Task Force (WCSONE). I am a graduate of the ATF Special Agent Basic Training Program and of the Oakland County Community College Police Academy. I have also earned a Master of Arts Degree in

Criminal Justice from Wayne State University. During my employment with ATF, I have participated in numerous criminal investigations focused on firearms, armed drug trafficking violations and criminal street gangs. I have also investigated violations of Title 18, United States Code, Section 922(g)(1), Felon in Possession of a Firearm.

3. I am currently investigating Steve George-Lorenzo HICKS, date of birth 09/xx/19xx, for a violation of federal firearms laws, specifically: felon in possession of a firearm, in violation of Title 18, United States Code, Section 922(g)(1).

4. On November 27, 2022, at approximately 5:30 p.m., Detroit Police Officers (DPD) were dispatched to Yosemite Street in Detroit, Michigan for a disturbance that involved a shot being fired. HICKS reportedly was at a residence holding a pistol, threatening individuals, and had fired at least one shot.

5. When DPD officers arrived, officers located HICKS in a residence. Officers approached and asked HICKS to exit the home, which he did. Officers detained HICKS and searched the residence and surrounding area. From the front porch, police recovered one 9mm spent shell casing, and one .40 caliber shell casing from the front yard. When they searched inside the home, officers recovered a Smith & Wesson Model: SD9VE, 9mm pistol in

a trashcan in the front room, approximately six feet from the front door. The Smith & Wesson 9mm contained one live round of ammunition in the chamber and one live round of ammunition in the magazine. The firearm had been reported stolen on November 14, 2022. Officers also recovered a 9mm spent shell casing in the floor vent in the front room.

6. On November 28, 2022, an officer swabbed the Smith & Wesson Model: SD9VE firearm for DNA and placed the swab on evidence. In April 2023, DPD obtained and executed a search warrant for HICKS' DNA. On April 28, 2023, ATF Forensic Science Laboratory received HICKS' DNA along with the swab obtained from the Smith & Wesson Model: SD9VE 9mm pistol. Testing was completed and the result of the comparison supports that HICKS' DNA was on the Smith & Wesson Model: SD9VE recovered on November 27, 2022.

7. On August 15, 2023, I reviewed a computerized criminal history (CCH) for HICKS. The CCH revealed the following:

- 2015 – Felony – Receiving & Concealing – Motor Vehicle –
Plead Guilty

8. Based on a description of the firearm, ATF Special Agent and Interstate Nexus Expert Kevin Rambus determined that the Smith & Wesson, Model: SD9VE, 9mm pistol is a “firearm” as defined under

Chapter 44, Section 921 and was manufactured outside the State of Michigan after 1898, therefore, traveling in and affecting interstate commerce.

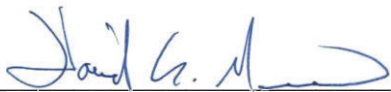
9. Based on the above-stated facts, I have probable cause to believe that Steve HICKS, having been previously convicted of at least one felony, did possess a firearm that had previously traveled in interstate commerce in violation of Title 18, United States Code, Section 922(g)(1).

Respectfully submitted,



Justin K. Henry, Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HONORABLE DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: October 24, 2023